


CERTIFICATION OF FRANCE TELECOM LONG DISTANCE USA, LLC

CPNI FILING FEB. 6, 2006

Dkt. No. EB-06-TC-060

In accordance with Section 64.2009(e) of the Commission's Rules, 47 C.F.R. § 64.2009(e), I, Morten Sorensen, Vice President of France Telecom Long Distance USA, LLC ("FTLD" or the "Company"), have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's Consumer Proprietary Network Information ("CPNI") regulations for the period covering Jan. 1, 2005 through Jan. 1, 2006.

A statement explaining how FTLD's procedures ensure compliance with the Commission's CPNI regulations is attached hereto.



Morten Sorensen, VP

Dated: Feb. 6, 2006



February 6, 2006

COMPLIANCE STATEMENT

FRANCE TELECOM LONG DISTANCE USA, LLC

1. France Telecom Long Distance USA, LLC ("FTLD") is a "telecommunications carrier" as defined by 47 U.S.C. § 153(44). FTLD currently provides voice services to other carriers on a wholesale basis only. FTLD provides data services mainly on a wholesale basis to other carriers, and also to a limited number of business customers and Internet Service Providers ("ISPs"). FTLD does not provide services directly to any individual residential or small business customers. As such, except in very specific limited circumstances, all customer proprietary network information ("CPNI") in FTLD's possession relates to its wholesale voice and data services, and is not end-user specific.

2. Compliance with 47 U.S.C. § 222:

Except as otherwise required by law, FTLD only uses, discloses, or permits access to CPNI received or obtained by FTLD by virtue of its provision of a telecommunications service in order to (i) provide the telecommunications service from which such information is derived, or (ii) provide services necessary to, or used in, the provision of such telecommunications service.

a. FTLD uses CPNI in order to initiate, render, bill and collect for telecommunications services provided.



france telecom

February 6, 2006

b. FTLD uses CPNI in order to protect the property of the carrier or to protect users and other carriers from fraudulent or illegal use of, or subscription to, such services.

c. FTLD does not provide any commercial mobile radio services ("CMRS") at this time.

d. FTLD does not use CPNI in order to market its services.

3. Compliance with 47 C.F.R. § 64.2005:

a. FTLD does not currently use, disclose or permit access to CPNI for the purpose of marketing services.

b. FTLD does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers.

c. FTLD does not use, disclose, or permit access to CPNI without customer approval, except as permitted or required by law.

i. FTLD does not provide inside wiring installation, maintenance or repair services.

ii. FTLD does not provide local exchange services or CMRS.



February 6, 2006

- d. FTLD uses, discloses or permits access to CPNI to protect its rights or property, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

4. Compliance with 47 C.F.R. § 64.2007:

a. Because FTLD's use of CPNI does not require customer approval under the Commission's Rules, it does not currently solicit customer approval for use of CPNI.

b. FTLD does not disclose or provide access to CPNI to any joint venture partners or independent contractors. As such, it does not currently have a confidentiality agreement with any such entities in place.

5. Compliance with 47 C.F.R. § 64.2008:

a. Because FTLD's use of CPNI does not require customer approval under the Commission's Rules, FTLD does not currently solicit customer approval for use of CPNI. As such, it does not solicit customer approval for use of CPNI.

6. Compliance with 47 C.F.R. § 64.2009:

a. Due to recent events, FTLD is implementing a system by which the status of a customer's CPNI approval, if any, can be clearly established prior to the use of CPNI. Because FTLD's use of CPNI does not require customer approval under the Commission's Rules, it has not previously set up such a system and at present FTLD does

not have approval from any customer to use CPNI for any purpose for which prior approval is required.

b. FTLTD has trained its personnel as to when they are, and are not authorized to use confidential, proprietary information, including but not limited to CPNI, and it has an express disciplinary process in place.

c. FTLTD does not use customer CPNI for marketing purposes. As such, it does not have any record of sales and marketing campaigns which use customer CPNI.

d. FTLTD has established a supervisory review process regarding its compliance with safeguarding confidential and proprietary information, including but not limited to CPNI. FTLTD does not conduct any marketing campaigns subject to the Commission's outbound marketing situations regulations.

e. FTLTD has established a procedure whereby an officer of the company conducts an internal annual compliance review of its processes for safeguarding confidential and proprietary information, including but not limited to CPNI.

f. Because FTLTD's only use of CPNI does not require customer approval under the Commission's Rules, it does not currently solicit customer approval for use of CPNI via opt-out mechanisms.